

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

| | | |
|---|---|------------------------------------|
| JAMES M. BAKER, On Behalf of Himself and All Others Similarly Situated, |) | Civil Action No. 1:05-cv-00272-GMS |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| MBNA CORP., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| ROCHELLE PHILLIPS, On Behalf of Herself and All Others Similarly Situated, |) | Civil Action No. 1:05-cv-00277-GMS |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| MBNA CORP., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

[Caption continued on following page.]

DECLARATION OF JEFFREY S. GODDESS IN SUPPORT OF THE MOTION OF
CITY OF DEERFIELD BEACH FOR CONSOLIDATION, APPOINTMENT AS LEAD
PLAINTIFF AND FOR APPROVAL OF SELECTION OF LEAD AND LIAISON
COUNSEL

JULY 5, 2005

| | | |
|---|---|------------------------------------|
| ROBERT WILKINS, Individually and On Behalf of All Others Similarly Situated, |) | Civil Action No. 1:05-cv-00287-GMS |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| MBNA CORP., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| LEONARD BRONSTEIN, On Behalf of Himself and All Others Similarly Situated, |) | Civil Action No. 1:05-cv-00289-GMS |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| MBNA CORP., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| GREG PENN, |) | Civil Action No. 1:05-cv-00293-GMS |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| MBNA CORP., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| CLIFFORD W. JONES, On Behalf of Himself and All Others Similarly Situated, |) | Civil Action No. 1:05-cv-00316-GMS |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| MBNA CORP., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

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| | | |
|---------------------|---|------------------------------------|
| MICHAEL D. BLUM, |) | Civil Action No. 1:05-cv-00372-GMS |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| MBNA CORP., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| |) | |

Jeffrey S. Goddess, declares, under penalty of perjury:

1. I am a member of Rosenthal, Monhait, Gross & Goddess, P.A. ("Rosenthal Monhait"), one of plaintiff's counsel in the action entitled *James M. Baker vs. MBNA Corp., et al.*, Civil Action No. 1:05-cv-00272-GMS (the "*Baker Action*"). I submit this Declaration in support of the motion of City of Deerfield Beach Non-Uniform Employees Retirement Plan ("City of Deerfield Beach") for consolidation, appointment as Lead Plaintiff and for approval of selection of Lead and Liaison Counsel.

2. Attached hereto as Exhibit A is a true and accurate copy of the first notice published regarding the pendency of these actions, published by plaintiff in the *Baker Action* on *Business Wire*, a national, business-oriented newswire service, on May 5, 2005.

3. Attached hereto as Exhibit B is a true and accurate copy of a loss chart presenting the transactions in the subject securities and summarizing the estimated losses of City of Deerfield Beach at \$36,530.52, in connection with its purchases of MBNA Corp. shares.

4. Attached hereto as Exhibit C is the certification of City of Deerfield Beach.

5. Attached hereto as Exhibit D is a true copy of the firm resume of Lerach Coughlin Stoia Geller Rudman & Robbins LLP.

6. Attached hereto as Exhibit E is a true copy of the firm resume of Rosenthal Monhait.

DATED: July 5, 2005


JEFFREY S. GODDESS (Del. No. 630)

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